

LAW OFFICES OF DALE K. GALIPO

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Attorneys for Plaintiffs

L.C., I.H., A.L., and Antonia Salas Ubaldo

**UNITED STATES DISTRICT COURT FOR THE
CENTRAL DISTRICT OF CALIFORNIA**

L.C., a minor by and through her
guardian *ad litem* Maria Cadena,
individually and as successor-in-interest
to Hector Puga; I.H., a minor by and
through his guardian *ad litem* Jasmine
Hernandez, individually and as
successor-in-interest to Hector Puga;
A.L., a minor by and through her
guardian *ad litem* Lydia Lopez,
individually and as successor-in-interest
to Hector Puga; and ANTONIA SALAS
UBALDO, individually;

Plaintiffs,

vs.

STATE OF CALIFORNIA; COUNTY
OF SAN BERNARDINO; S.S.C., a
nominal defendant; ISAAH KEE;
MICHAEL BLACKWOOD;
BERNARDO RUBALCAVA; ROBERT
VACCARI; JAKE ADAMS; and DOES
6-10, inclusive,

Defendants.

Case No. 5:22-cv-00949-KK-SHK

Honorable Kenly Kiya Kato

JOINT WITNESS LIST

FPTC: May 15, 2025

TIME: 10:30 a.m.

CTRM: 3

TRIAL: June 2, 2025

**TO THE HONORABLE COURT, ALL PARTIES AND THEIR
ATTORNEYS OF RECORD:**

Pursuant to the Court’s Civil Trial Scheduling Order, Plaintiffs L.C., a minor by and through her guardian *ad litem* Maria Cadena; I.H., a minor by and through his guardian *ad litem* Jasmine Hernandez; A.L., a minor by and through her guardian *ad litem* Lydia Lopez; and Antonia Salas Ubaldo (“Plaintiffs”) and Defendants State of California, by and through the California Highway Patrol, Michael Blackwood, Isaiah Kee, Bernardo Rubalcava (“State Defendants”), County of San Bernardino, Robert Vaccari, and Jake Adams (“County Defendants”) (collectively “the Parties”), hereby submit this Joint Exhibit List for the June 2, 2025 trial.

All parties reserve the right to call any witness listed by another party.

DATED: April 24, 2025

LAW OFFICES OF DALE K. GALIPO

Bv /s/ Hang D. Le
Dale K. Galipo
Hang D. Le
Attorneys for Plaintiffs

DATED: April 24, 2025

ROB BONTA
Attorney General of California
NORMAN D. MORRISON
Supervising Deputy Attorney General

/s/ *Diana Esquivel*

DIANA ESQUIVEL
Deputy Attorney General
*Attorneys for Defendant State of Cal., by and
through the CHP, Blackwood, Kee, and
Rubalcava*

1
2 DATED: April 24, 2025

LYNBERG & WATKINS

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5 By /s/ Amy R. Margolies

Shannon L. Gustafson

Amy R. Margolies

Attorneys for Defendants

COUNTY OF SAN BERNARDINO,

ROBERT VACCARI. and JAKE ADAMS

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10 *The filer, Hang D. Le, hereby attests that all other signatories listed, and on whose
11 behalf the filing is submitted, concur with the filing's content and have authorized
12 the filing.
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<u>Witness Name</u>	<u>Party Calling</u>	<u>Time: Direct Exam</u>	<u>Time: Cross Exam.</u>	<u>Description of Testimony</u>
1. Isaiah Kee (i-zay-a key)	Plaintiff, County Defendant & State Defendant	1.5 hrs P	4 hrs SD .25 hrs CD	Involvement in Decedent's pursuit, stand-off & shooting; training & experience; information known to him at the time of the incident; facts and circumstances known to him surrounding the incident; his recorded interview and deposition testimony; hypothetical questions; and all related liability questions.
2. Bernardo Rubalcava (beh-r-NAR-doh roo-ball-Kava)	Plaintiff, County Defendant & State Defendant	1.5 hrs P	3 hrs SD .25 hrs CD	Involvement in Decedent's pursuit, stand-off & shooting; training & experience; information known to him at the time of the incident; facts and circumstances known to him surrounding the incident; his recorded interview and deposition testimony; hypothetical questions; and all related liability questions.
3. Michael Blackwood (MY-kuhl black-wood)	Plaintiff, County Defendant & State Defendant	1.5 hrs P	3 hrs SD .25 hrs CD	Involvement in Decedent's pursuit, stand-off & shooting; training & experience; information known to him at the time of the incident; facts and circumstances known to him surrounding the incident; his recorded interview and

<u>Witness Name</u>	<u>Party Calling</u>	<u>Time: Direct Exam</u>	<u>Time: Cross Exam.</u>	<u>Description of Testimony</u>
				deposition testimony; hypothetical questions; and all related liability questions.
4. Jake Adams (jayk a-duhms)	Plaintiff, County Defendant & State Defendant	1.5 hrs P	3 hrs SD 3 hrs CD	Involvement in decedent's pursuit, stand-off & shooting; training & experience; information known to him at the time of the incident; facts and circumstances known to him surrounding the incident; his recorded interview and deposition testimony; hypothetical questions; and all related liability questions.
5. Robert Vaccari (ra-bert vak-ka-ree),	Plaintiff, County Defendant & State Defendant	1.0 hr P	3 hrs SD 3 hrs CD	Involvement in Decedent's pursuit, stand-off & use of non-lethal force; training & experience; information known to him at the time of the incident; facts and circumstances known to him surrounding the incident; his recorded interview and deposition testimony; hypothetical questions; and all related liability questions.
6. Jonathan Wayne Botten, Sr.	Plaintiff	.75 hr P	.75 hrs SD .5 hrs CD	Mr. Botten will testify to his observations regarding the facts and circumstances relating to the incident; injuries sustained by him

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(jon-uh-thuhn w-AI-n bat-en)				and his family members as a result of the shooting.
7. Betzabeth Gonzalez (bET-zuh-BEHTH gon-zaa-lis)	Plaintiff	0.75 hr P	0.75 hrs SD 0.5 CD	Ms. Gonzalez will testify to her observations regarding the facts and circumstances relating to the incident.
8. Erin Mangerino (eh-ruhn mAHN-juh-REE-no),	Plaintiff, County Defendant & State Defendant	0.5 hr P	0.5 hrs SD 0.5 hrs CD	Neighbor. Observation of Puga's interaction with law enforcement & video taken. Will testify to her observations regarding the facts and circumstances relating to the incident.
9. Robert Ripley (ron-urht rip-lee),	Plaintiff & County Defendant	1 hr P	1 hr SD 0.5 hr CD	Detective Ripley is a detective for the County of San Bernardino Sheriff's Department and is the detective who processed the scene of the incident. He will testify to his investigation and findings of the subject scene, the physical evidence obtained, the documenting of evidence locations at the scene as well as preparation of his report.
10. Timothy Jong, MD (Ti-muh-thee jONG)	Plaintiff, County Defendant & State Defendant	1 hr P	0.75 hrs SD .5 hrs CD	Performance and results of Puga's autopsy. Dr. Jong was the County Medical Examiner who performed Puga's autopsy. He will testify to the autopsy he performed, the external

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				examination of Puga's body, his observations of the wounds found on Puga's body, the nature and extent of Puga's injuries, the cause and manner of the injuries found on Puga, the trajectory of the gunshot wounds, the internal examination of Puga's body, any other autopsy findings, cause and manner of death, whether gunshot wounds are consistent with specific body positioning, and any hypotheticals posed to him.
11. Roger Clark (rO-juh-r klark)	Plaintiff	1.5 hrs P	1 hr SD 1 hr CD	Mr. Clark is Plaintiffs' retained police practices expert. He will testify to his background, experience, training and POST standards, as well as his opinions regarding the officers' conduct, tactics, and use of force pursuant to standard police practices and training, and answer any hypotheticals posed to him.
12. Jasmine Hernandez (jaes-min hur-nan-dez)	Plaintiff, County Defendant & State Defendant	0.5 hr P	0.5 hr SD 0.5 hr CD	Plaintiff's mother. Knowledge of Puga's relationship with I.H. She will testify to the relationship I.H. had with his father, and the loss of love, comfort, society and

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				support suffered by I.H. by the loss of his father.
13. Lydia Lopez (lih-dee-uh lo-peh)	Plaintiff, County Defendant & State Defendant	0.5 hr P	0.5 hr SD .5 hr CD	Plaintiff's mother. Knowledge of Puga's relationship with A.L. She will testify to the relationship A.L. had with her father, and the loss of love, comfort, society and support suffered by A.L. by the loss of her father.
14. Maria Cadena (muh-ree-uh ka-den-a)	Plaintiff, County Defendant & State Defendant	0.5 hr P	0.5 hr SD 0.5 hr CD	Plaintiff's mother. Knowledge of Puga's relationship with L.C. Ms. Lopez is the natural mother and guardian ad litem of Plaintiff L.C. She will testify to the relationship L.C. had with her father, and the loss of love, comfort, society and support suffered by L.C. by the loss of her father.
15. Antonia Salas Ubaldo (an-toh-nee-uh saa-luhs uh-BAHL-doh)	Plaintiff & County Defendant	0.5 hr P	0.5 hr SD 0.5 hr CD	Ms. Salas-Ubaldo is the mother of Puga. She will testify to her relationship with Puga and the loss of love, comfort, society and support she suffers as a result of the loss of her son.
16. Gabriela Salas (gab-ri-ela sal-as)	Plaintiff, County Defendant & State Defendant	0.5 hr P	0.5 hr SD 0.5 hr CD	Puga's sister. Observation of Puga's possession of gun & his relationship with plaintiffs She will testify to Ms. Salas-Ubaldo and the

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				minor children's relationships with Puga and the loss of love, comfort, society and support they suffer as a result of his death.
17. Arthur Miranda (aR-thur mi-ran-duh)	County Defendant	0.2 hr CD	0.2 hr P	Neighbor, witness and 911 caller that reported seeing man with gun.
18. Nancy Juarez (nANE-see hOO-ah-rees)	County Defendant	0.25 hr CD	0.25 hr P	Puga's Sister
19. Annabelle Botten (aN-uh-bel baut-ten)	County Defendant & State Defendant	0.5 hr CD 1 hr SD	0.5 hr P	Neighbor. Observation of Puga's interaction with law enforcement
20. Edward Mangerino (ed-Werd mAHN-juh-REE-no)	County Defendant & State Defendant	1 hr CD 1.5 hr SD	0.5 hr P	Neighbor. Observation of Puga's interaction with law enforcement & video taken.
21. Tammy Goodson (ta-mee gUUD-sun)	County Defendant & State Defendant	.75 hr CD 1 hr SD	0.5 hr P	Neighbor. Observation of Puga's interaction with law enforcement.
22. Alejandro Tovar (ah-leh-Hahn-droh tho-vahr)	County Defendant & State Defendant	2 hr SD .25 CD	0.5 hr P	CHP Officer. Investigation into the 4/16/21 freeway shooting involving Puga.

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23. J. Johnson* (Jon- suhn),	County Defendant	.25 hr CD	0.25 hr P	Deputy with knowledge and involvement in investigating freeway shooting incident.
24. R. Maday* (Mei-dei)	County Defendant	.25 hr CD	0.25 hr P	CHP, Assisting Investigator with knowledge of freeway shooting incident.
25. Xavier Rodriguez * (ex-ZAY-vee-er or ZAY-vee-er roh-DREE-gehz)	County Defendant	.25 hr CD	0.25 hr P	CHP, Assisting Officer with knowledge of freeway shooting incident.
26. Jorge Leanos* (jor-geh IEE-uh-nohz)	County Defendant	.25 hr CD	0.25 hr P	CHP, Assisting Officer with knowledge of freeway shooting incident.
27. J. Rodriguez* (roh-DREE-gehz),	County Defendant	.25 hr CD	0.25 hr P	CHP, Assisting Officer with knowledge of freeway shooting incident.
28. C. Ramos* (rAH-mohss),	County Defendant	.25 hr CD	0.25 hr P	CHP, Assisting Officer with knowledge of freeway shooting incident.
29. Isaac Vega * (eYE-zuhk vay-guh),	County Defendant	.25 hr CD	0.25 hr P	Deployed spike strip during pursuit.
30. Kevin Henry * (kEE-vin Hen-ree)	County Defendant	.25 hr CD	0.25 hr P	Aviation helicopter pilot over pursuit.
31. Greg Hanrahan * (gR-EH-g Hahn-ruh-hun)	County Defendant	.25 hr CD	0.25 hr P	Tactical Flight Officer. who broadcasted pursuit on the radio.

<u>Witness Name</u>	<u>Party Calling</u>	<u>Time: Direct Exam</u>	<u>Time: Cross Exam.</u>	<u>Description of Testimony</u>
32. Angelo Gibilterra * (aN-juh-loh jee-bee-ter-rah)	County Defendant	.25 hr CD	0.25 hr P	Participated in investigation of incident.
33. Edward Hernandez * (ed-Werd hur-nan-dez),	County Defendant & State Defendant	.25 hr CD	0.25 hr P	SBCSD Detective. Investigation of Puga's shooting and findings.
34. Scott Abernathy* (SKOT Ab-er-nath-ee)	County Defendant	.25 hr CD	0.25 hr P	SBCSD Detective. Investigation of Puga's shooting and findings
35. Adrian Bustamante * (aY-dree-en boos-tah-mun-te),	County Defendant	.25 hr CD	0.25 hr P	Investigator Investigations Team, participated in investigation of incident.
36. Stephanie Seavey * (stef-uh-nee see-Vee)	County Defendant	.25 hr CD	0.25 hr P	Crime Scene Specialist, participated in investigation of incident.
37. Chris Hermosillo * (kRIHS her-maw-SEE-yo)	County Defendant	.25 hr CD	0.25 hr P	Crime Scene Specialist, participated in investigation of incident.
38. Lauren Laidlaw * (lOR-en or LAW-ren lAH-dlaw)	County Defendant	.25 hr CD	0.25 hr P	Investigations Team, responded to the incident.

<u>Witness Name</u>	<u>Party Calling</u>	<u>Time: Direct Exam</u>	<u>Time: Cross Exam.</u>	<u>Description of Testimony</u>
39. Andrew Walk* (An-droo Waak)	County Defendant	.25 hr CD	0.25 hr P	Emergency Medical Technician of Medic Ambulance 22 /personnel of the San Bernardino County Fire Department. First responder to incident.
40. D. Moreno * (Mor-eh-no)	County Defendant	.25 hr CD	0.25 hr P	LASO Deputy ID No. 622431, involved in 2-16-21 incident re Puga fleeing from police.
41. Deputy Galindo * (ga-LIHN-doh)	County Defendant	.25 hr CD	0.25 hr P	LASO Deputy ID No. 622431, involved in 2-16-21 incident re Puga fleeing from police.
42. Deputy Contreras * (kan-tre-ras)	County Defendant	.25 hr CD	0.25 hr P	LASO Deputy ID No. 622431, involved in 2-16-21 incident re Puga fleeing from police.
43. Deputy Chavez * (shah-vez)	County Defendant	.25 hr CD	0.25 hr P	LASO Deputy ID No. 622431, involved in 2-16-21 incident re Puga fleeing from police.
44. Jeff Lewison* (jef loo-uh-suhn)	County Defendant	.25 hr CD	0.25 hr P	Coroner Investigator Report.
45. Gabriella Grant * (Gah-bree-EL-uh Grant)	County Defendant	.25 hr CD	0.25 hr P	Report of Death Worksheet, responded to the incident.
46. Pamela Sokolik-Putnam *	County Defendant	.25 hr CD	0.25 hr P	Autopsy Protocol and Coroner Investigation Report

<u>Witness Name</u>	<u>Party Calling</u>	<u>Time: Direct Exam</u>	<u>Time: Cross Exam.</u>	<u>Description of Testimony</u>
(Pah-MEH-lah SOH-koh-lik Puh-tuh-nuhm)				
47. Bradley Coleman * (brad-lee kOHL-muhn)	County Defendant	.25 hr CD	0.25 hr P	Participated in Coroner Investigation.
48. Tamara Paris* (TA-mah-rah or Tuh-MAH-ruh Per-is)	County Defendant	.25 hr CD	0.25 hr P	Assistant to Forensic Pathologist, assisted with autopsy.
49. Erin A. Spargo Ph.D * (Eh·ruhn SPAR-go)	County Defendant & State Defendant	.25 hr CD 1hr SD	0.25 hr P	Forensic Toxicologist who performed and obtained results of toxicology tests/report
50. Jamie Cimino* (jAY-mee chi-mee-no)	County Defendant	.25 hr CD	0.25 hr P	DDA San Bernardino County District Attorney's Office
51. David Steele * (dAY-vid stee-l)	County Defendant	.25 hr CD	0.25 hr P	Senior DA Investigator, San Bernardino County District Attorney's Office
52. Lucien C. "Luke" Haag (loo-sheen "Lu-k" Hah-ch)	County Defendant & State Defendant	1.5 hr CD 2 hr SD	1 hr P	Expert opinion on ballistics & trajectories.
53. Kenneth L. Hubbs	County Defendant	3 hr CD	1.5 hrs P	Defense Expert Police Practice.

<u>Witness Name</u>	<u>Party Calling</u>	<u>Time: Direct Exam</u>	<u>Time: Cross Exam.</u>	<u>Description of Testimony</u>
(KEN-ith Hu-hbs),				
54. Alexander Jason (al-ehk-SAHN-der JAY-sahn)	County Defendant & State Defendant	3 hr CD 2 hr SD	1.5 hrs P	Expert opinion on crime scene reconstruction.
55. Kris Mohandie P.H.D. (kris moh-ahn-dee or mah-ahn-dee)	County Defendant & State Defendant	2 hr CD 2 hr SD	1 hr P	Expert opinion on “suicide by cop”.
56. Richard Franklin Clark, Jr., M.D. (rih-churd frang-kluhn klark)	County Defendant & State Defendant	.75 hr CD 2hr SD	0.5 hr P	Expert opinion of Puga’s intoxication.
57. Joshua Peter Visco, Esq. (jAH-shuh-wuh pee-tr vees-ko)	County Defendant & State Defendant	.75 hr CD 2hr SD	0.5 hr P	Expert opinion of Puga’s pending & anticipated criminal charges.
58. Kirk Garrison* (kurk geh-ruh-sn),	County Defendant	1 hr CD	0.5 hr P	Criminalist II San Bernardino County Sheriff’s Department – Puga gun analysis
59. Custodian of Records from the Sheriff’s Department for audio and	County Defendant	.5 hr CD	0.25 hr P	Foundation/authenticity re Records from the Sheriff’s Department for audio and video recordings

<u>Witness Name</u>	<u>Party Calling</u>	<u>Time: Direct Exam</u>	<u>Time: Cross Exam.</u>	<u>Description of Testimony</u>
video recordings*				
60. Custodian of Records from CHP for audio and video recordings*	County Defendant	.5 hr CD	0.25 hr P	Foundation/authenticity re Records from CHP for audio and video recordings
61. Custodian of Records for Subp. Records*	County Defendant	.5 hr CD	0.25 hr P	Foundation/authenticity re subpoenaed records
62. Greg Meyer (g-r-eh-g my-er)	State Defendant	4 hrs SD 1 hr CD	1.5 hr P	Expert opinion on police practices; reasonableness of State Defs.' use of force
63. Salvador Hernandez Pacheco (sal-ba-door her-nan-dez pa-che-ko)	State Defendant	2 hrs SD	0.5 hr P	Victim witness. Interaction with Puga on 4/16/21 and resulting freeway shooting
64. Jeremy Pedergraft (jer- e-mi ped-er-graft)	State Defendant	1 hr SD	0.5 hr P	Paramedic. Examination of Puga & declared him dead at scene
65. A. McAllister (mak-al-ister)	State Defendant	2 hrs SD	0.5 hr P	CHP MAIT Investigator. Investigation of Puga's shooting and findings.
66. J. Carter (kart-er)	State Defendant	2 hrs SD	0.5 hr P	CHP MAIT Team Leader. Investigation of Puga's shooting and findings.

*** Any witness with an asterisk (*) is only to be called if there is an evidentiary dispute.**